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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Luis A Sanchez aka Luis A. Sanchez, Sr.,	Case No. 18-13226-CMG
	Hearing Date: April 18, 2018 at 10:00 a.m.
Debtor.	Judge: Christine M. Gravelle

OBJECTION TO PLAN CONFIRMATION

JPMorgan Chase Bank, National Association (the "Secured Creditor"), by its counsel, McCalla Raymer Leibert Pierce, LLC, states the following grounds as and for an Objection to Confirmation of the Debtor's Chapter 13 plan (the "Plan"):

1. Secured Creditor holds the perfected first mortgage on Debtor's real property; the property known as 14 Gloucester Court, Eastampton, NJ 08060 (the "Property"). On November 19, 2007, Luis A Sanchez aka Luis A. Sanchez, Sr. (the "Debtor") and Elinore Acuna (collectively, the "Borrowers") borrowed \$272,844.00 in exchange for a mortgage on the Property (the "Mortgage"). The Mortgage was recorded prepetition on November 28, 2007 in the Burlington County Clerk's Office. The Mortgage was subsequently modified by a loan modification agreement executed by Luis Sanchez and Elinore Acuna on February 2, 2011 extending the maturity date to February 1, 2041. Secured Creditor anticipates filing a proof of claim with approximate arrears of \$28,933.56 on a total claim of approximately \$300,819.23.

2. Debtor's proposed Chapter 13 Plan acknowledges arrears owed to Secured Creditor, but proposes to pay a sum through the Plan that is insufficient to cure the anticipated arrears claim. The Plan provides for a total arrears of \$13,000.00 while approximately \$28,933.56 is required to cure arrears owed. Absent a modification of the Chapter 13 Plan to cure arrears owed, the Plan cannot be confirmed.

3. Secured Creditor objects to any proposed plan by Debtor that fails to provide a feasible independent plan of reorganization.

WHEREFORE, Secured Creditor respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan for the reasons set forth above and for other relief as the Court may deem just and proper.

Dated: April 9, 2018

McCalla Raymer Leibert Pierce, LLC
Attorneys for Secured Creditor

By: /s/Phillip Raymond
Phillip Raymond

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CERTIFICATION OF SERVICE

- I, _____:
☐ represent the _____ in the above-captioned matter.
☒ am the secretary/paralegal for McCalla Raymer Leibert Pierce, LLC who represents the Secured Creditor.
☐ am the _____ in the above case and am representing myself.
- On _____, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
 - Objection to Plan
- I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.